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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 10 SANDRA HERRERA,

CASE NO.: 2:23-cv-01397-JAD-BNW

11 Plaintiff,

12 vs.
13 **STIPULATION TO EXTEND
PLAINTIFF'S RESPONSE DEADLINE
FOR DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT [ECF NO. 28]
(FIRST REQUEST)**

14 FLORENCE MCCLURE WOMEN'S
15 CORRECTIONAL CENTER FACILITY;
16 STATE OF NEVADA ex rel. NEVADA
17 DEPARTMENT OF CORRECTIONS, a
18 Political Subdivision of the State of Nevada;
19 TIMOTHY CALUMPONG, Director of
20 Nursing, FMWCC, and individually; BETTY
21 S. OMANDAC, Nurse Practitioner, FMWCC,
22 and individually; ELLA CORDOVEZ, Nurse
23 Practitioner, FMWCC, and individually;
GABRIELA NAJERA, Warden, FMWCC,
and individually; MICHAEL MINEV,
Medical Director, NDOC and individually;
CHARLES DANIELS, Director, NDOC, and
individually; DOE INDIVIDUALS 1-100,
inclusive; ROE CORPORATIONS 1-100,
inclusive;;

24 Defendants.

25
26 Plaintiff, SANDRA HERRERA, by and through attorney of record, JAMES D. URRUTIA,
27 ESQ. of LJU LAW FIRM, and State Defendants, by and through their attorney of record, MAYRA
28 GARAY, ESQ., of the OFFICE OF THE ATTORNEY GENERAL hereby submit their stipulation

1 and agreement to extend the deadline for Plaintiff to respond to Defendants' Motion for Summary
2 Judgment [ECF 28] and respectfully request that the Court extend the response deadline for a period
3 of thirty (30) days, making Plaintiff's Response to Defendants Motion for Summary due on Friday
4 April 18, 2025. The parties request is supported in good cause.

5 On February 26, 2025, Defendants submitted their Motion for Summary Judgment [ECF
6 28], accompanied by a supplemental disclosure of documents. In addition to the documents
7 produced in their Initial Disclosure, Defendants have identified further documents marked as
8 "attorney's eyes only" in a discovery log. These documents will be made available to Plaintiff once
9 a Protective Order is established. Although Plaintiff's counsel has had the opportunity since
10 September 2024 to request a Protective Order, the parties have agreed to extend the response
11 deadline to April 18, 2025, to facilitate the establishment of this Protective Order and the subsequent
12 disclosure of the protected documents.

13 Dated this 12th day of March, 2025.

14 Dated this 12th day of March, 2025.

15 **LJU LAW FIRM**

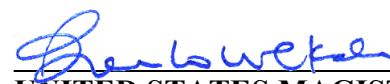
16 **OFFICE OF THE ATTORNEY GENERAL**

17 /s/ James D. Urrutia
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21 /s/ Mayra Garay
22 MAYRA GARAY, ESQ.
(Bar No.)
1 State of Nevada Way, Suite 100
23 Las Vegas, NV 89119
Counsel for Defendants

24 **IT IS SO ORDERED.**

25 **DATED: 3/25/2025**

26 
27 **UNITED STATES MAGISTRATE JUDGE**